

# EXHIBIT 14



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May 12, 2021

**Via Electronic Mail**

Zack Tortora, Esq.  
Derek Smith Law Group PLLC  
1 Penn Plaza, Suite 4905  
New York, NY 10119

**Re: Kristina Mikhaylova v. Bloomingdale's, Inc., et al.  
Case No. 19-cv-08927**

Dear Mr. Tortora:

This letter is in response to your April 20, 2021 letter related to Bloomingdale's, LLC ("Bloomingdale's") January 12, 2021 Interrogatory Responses. We will respond to each issue you raise in turn below.

**Interrogatory Number 6**

Bloomingdale's believes that its objections are well-taken. However, as a compromise, Bloomingdale's suggests that, to the extent maintained, it will produce the names of any employees in Bloomingdale's 59<sup>th</sup> Street store location who were investigated for suspicious activity on their Bloomingdale's cards for the last 5 years – 2016 to the present. If you advise that this acceptable, Bloomingdale's will investigate whether this information is maintained and the burden to retrieve it. Please note this suggested compromise in no way is an admission that the information is maintained or can be retrieved without undue burden. If unduly burdensome, Defendants maintain the right to stand by their initial objections along with an objection to the burdensome nature of the request and lack of proportion to the needs of the case.

**Interrogatory Numbers 7-10, 12-13**

Last known contact information for the requested former employees, subject to the protective order between the parties, is as follows:

- Eleanor Dahan - [REDACTED]
- Ronald (Nehemiah) Falber-Stroud - [REDACTED]
- Henri Derkovorkian - [REDACTED]

Zack Tortora, Esq.  
Page 2

May 12, 2021

- [REDACTED]
- Shixi Zhang - [REDACTED]

- Yaxuan Zhang - [REDACTED]

- Julie Truong - [REDACTED]

**Interrogatory Number 15**

Bloomington's does not maintain a list of employees who have been terminated for discount abuse. Plaintiff's termination code – 529 Misconduct/Policy Violation – encompasses numerous issues including any policy violations or misconduct. To determine who meets the requirements of this interrogatory would require Bloomington's to go through the employment files of every employee discharged during the specified time period who had the same termination code as the plaintiff. This request, and the burden to respond to it is not proportional to the needs of the case. However, in an effort at compromise, Defendants will produce the information – subject to the protective order between the parties – related to the investigations of other employees at the Chanel Handbag department in the 59<sup>th</sup> Street store who were part of the fraud issues that also implicated Plaintiff.

Very truly yours,

SCHOEMAN UPDIKE KAUFMAN  
& GERBER LLP

By: /s/ Steven Gerber  
Steven Gerber

MACY'S LAW DEPARTMENT

By: /s/ Betty Thorne Tierney  
Betty Thorne Tierney